

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **No. 1:CR-01-72-02**
:
v. :
:
CHELSEA YOCUM :

MOTION TO CONTINUE SENTENCING HEARING

AND NOW, comes Chelsea Yocum, by and through counsel, and files the within motion to continue the sentencing hearing:

1. Defendant is Chelsea Yocum.
2. By order of court of May 11, 2005, the undersigned counsel was appointed to represent the above mentioned defendant.
3. The defendant's sentencing hearing is currently scheduled for Tuesday, August 9, 2005 at 2:00 p.m.
4. Counsel needs time to meet with the defendant to prepare for the sentencing hearing.
5. Counsel has not had an opportunity to meet with the defendant because the defendant is as of August 3, 2005 being housed at the Federal Transfer Center in Oklahoma City, Oklahoma.
6. Counsel is requesting that sentencing be rescheduled for a time 30 days after August 9, 2005 to allow the defendant an opportunity to be transferred to the Dauphin County Prison and to allow counsel and the defendant time to meet to prepare for the sentencing hearing.

7. The undersigned counsel has contacted Attorney Christy Fawcett and Attorney Fawcett concurs in the defendant's request to continue the sentencing hearing.

WHEREFORE, based on the foregoing, it is respectfully requested that this Honorable Court reschedule the defendant's sentencing hearing to a date at least thirty (30) days after August 9, 2005.

Respectfully submitted,

/s/ Gerald A. Lord

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CERTIFICATE OF CONCURRENCE

I, Gerald A. Lord, hereby certify that my office contacted counsel for the respondent, Christy Fawcett, and Attorney Fawcett is not opposed to counsel's request for a continuance of the sentencing hearing.

Date: August 3, 2005

s/ Gerald A. Lord